

# EXHIBIT 2



**Keith Van Meter, MD  
17 Carriage Lane  
New Orleans LA 70114  
504-813-9752**

**June 2, 2025**

Henry Labas, JD  
2 Flagg Place, Suite One  
Lafayette LA 70508

Dear Henry:

Briefly, the injured worker (Ronnie Blanchard Jr, who is 40 years old), was fastened by a lanyard to the steel structure of a hydraulic work over (HWO) unit which collapsed, carrying him in the entanglement of structural steel to an approximate 30 ft depth of the seabed in the Gulf of Mexico.

The accident occurred at a single well caisson #19, located in Main Pass block 64 of the Gulf of Mexico. The well was owned and operated by Sanare Energy Partner's (SEP) and was first constructed in 1991.

SEP contracted SBS Energy Services (SBS) for whom Ronnie Blanchard worked, to install a HWO atop the single well caisson involved in the case. The HWO assembly weighed 120,000 pounds and was installed segmentally with the help of a crane on the deck of the lift boat. The lift boat was anchored by three driven spuds in position along the single caisson well. This was the first time that SBS had placed an HWO atop a single caisson well.

The well consisted of an outer 40" diameter steel caisson with a central 20" diameter structural steel caisson. In the gap between 40" caisson and the 20" caisson a trash cover was concealing corrosion and thinning of the steel of the structural caisson. Additionally, the anchor spool around the structural caisson was not welded to the structural caisson as a measure to stabilize the addition of the HWO atop it.

On March 26, 2022, Ronnie Blanchard boarded the top of the HWO by way of lift basket and fastened himself to the steel structure by lanyard. The anchor spool had anchor beams fastened to it as outriggers for guy lines to be attached to the upper reaches of the HWO towering structure. Not all of the guidelines were in place at this time. The crane with spreader bar had an 8,000 pound lift on the HWO. At the time, a variable 20 mile-an-hour wind was occurring. Ronnie Blanchard unfastened the spreader bar from the HWO and almost immediately the HWO tower toppled, plunging Ronnie Blanchard into the water below. Some workers viewing part of the fall rushed immediately to the side of the lift boat and saw his work helmet float up to the surface. Fourteen hours later, divers found him still fastened to the HWO structure now on the subsea floor.

His clothes were intact and he had, by autopsy, subscalpular hematoma and subdural hematoma, and subarachnoid hematoma and a ruptured aorta with hemothoraces and facial and limb abrasions. Blood toxicology reported caffeine as the only drug substance aboard. as In my opinion sometime during the fall he had a severe head and body strike against steel of the HWO and at that time most probably lost consciousness, then accompanying AC water drowning. Minimally he would have experienced fright in the initial start of the fall before the head and body strike.

It would be helpful to interview the commercial diver who performed the body recovery in order to report how difficult it would have been to free the lanyard attachment and the position of the body in the fallen steel structure.

As a corollary, had Ronny Blanchard been in a hypothetical motor vehicle accident, having had the same instantaneous injuries, he would have had instant fright immediately followed by loss of consciousness. Had the car then gone into the water in this hypothetical case, he would have been unaware of drowning, even if he was momentarily breathing. (We have faced this same type of motor vehicle accident where I work in the emergency department at a Level 1 Trauma Center.)

Sincerely, Keith Van Meter, MD

A handwritten signature in black ink that reads "Keith Van Meter". The signature is written in a cursive, flowing style.

ABEM boarded in Emergency Medicine,  
Undersea and Hyperbaric Medicine,  
Pediatric Emergency Medicine  
Medical Toxicology